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TODD J. KROUNER*

*ADMITTED IN NY, NJ AND CA

July 10, 2025

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square, Room 415
New York, NY 10007

Re: Dass v. City University of New York, et al.
Civil Action No. 18–Civ.–11325 (VSB) (OTW)

Dear Judge Broderick:

I am the attorney for the plaintiff in the above–referenced action. I am writing seeking clarification regarding your Individual Rules’ word limit for a memorandum in opposition to a motion for summary judgment.

Your Individual Rules state that “memoranda of law . . . in opposition to motions are limited to 8,750 words.” Broderick, J., Individual Rule 4(B). Does the word limit include or exclude the caption, table of contents, and table of authorities?

Respectfully submitted,

Todd J. Krouner

cc: Karen Rhau, Esq.
(Via ECF)

TJK/dm